

G O D D A R D L A W P L L C

39 Broadway, Suite 1540 | New York, NY 10006

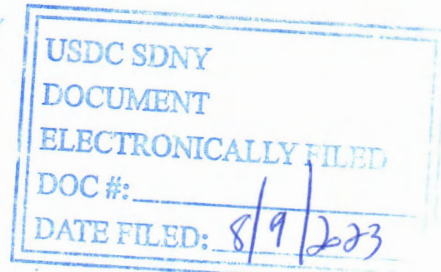
Office. 646.964-1178

Fax. 212.473.8705

Megan@goddardlawnyc.com

WWW.GODDARDLAWNYC.COM

August 4, 2023



VIA ECF

The Honorable Judge Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street, Room 2550
New York, New York 10007

Re: **Breanna Williams v. Minthouse, Inc., et al.**
Case No.: 1:23-cv-06673

OK
Colleen McMahon
8/9/2023

Dear Honorable Judge McMahon:

The undersigned is counsel to Plaintiff Breanna Williams ("Plaintiff") in the above-referenced matter. I write jointly with counsel for Defendants, to respectfully propose a schedule for the Parties' anticipated pleadings.

Plaintiff started this action by filing a Summons with Notice in the New York State Supreme Court, New York County on March 10, 2023. Counsel for Defendants removed this case to this Court on July 31, 2023. Currently the deadline to file a Complaint per Defendants' Demand filed on July 18, 2023, is August 7, 2023. However, Defendants agreed to allow Plaintiff a 30-day extension to September 6, 2023, as Attorney Adam Grogan departed the Firm on July 27, 2023, and the firm is currently reassigning the matter and would like to give the new assigned Attorney time to get familiar with the matter.

Accordingly, the Parties respectfully propose the following schedule for filing the anticipated pleadings:

Plaintiff's deadline to file a complaint	September 6, 2023
Defendant's deadline to Answer or otherwise respond to Plaintiff's complaint	November 6, 2023
Initial Conference	To be set by the Court at your Honor's convenience

We thank the Court for its time and attention to this matter and its consideration of this request.

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Respectfully submitted,
GODDARD LAW PLLC

/s/ Megan S. Goddard

By: Megan S. Goddard, Esq.

cc: All counsel [*Via ECF*]